

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Central District

No. 4:18-cv-40009

| | | |
|---------------------|---|----------------------|
| D.M., et al., |) | |
| PLAINTIFFS, |) | MOTION TO ADMIT |
| |) | ANDREW J. KING TO |
| v. |) | THE DISTRICT COURT |
| |) | OF MASSACHUSETTS, |
| CYNTHIA DUNGEY, |) | <i>PRO HAC VICE.</i> |
| DAVID DOMBROWSKI, |) | |
| ASHLEY KELLER, and, |) | |
| LYNN STACY, |) | |
| DEFENDANTS. |) | |

The undersigned counsel respectfully moves this court to admit Andrew J. King, Esquire, as counsel for the Delaware County Defendants (David Dombrowsky, Ashley Keller and Lynn Stacy), *pro hac vice*, in this matter, under Local Rule 83.5.3. Andrew J. King is not a member of this Court's bar, but meets the requirements of admission as set forth in Exhibit A. Attorney King's representation of such Defendants would be consistent with his duties as an Assistant Prosecuting Attorney for the Delaware County Prosecuting Attorney's Office. Therefore, the undersigned counsel respectfully asks this Honorable Court to allow him to appear in this matter.

Respectfully submitted,

/s/ James P. McKenna

James P. McKenna, Esquire
BBO # 548681
P.O. Box 541
North Grafton, MA 01536
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774.317.0983

February 13, 2018

Exhibit A

In The United States District Court for the District of Massachusetts

D.M., et al.,

Plaintiffs

v.

Cynthia Dungey, et al.,

Defendants.

Case No: 4:18-cv-40009

Judge Hillman

Magistrate Hennessey

AFFIDAVIT OF ANDREW KING

STATE OF OHIO :
: ss.
COUNTY OF DELAWARE :

I, Andrew King, having been duly cautioned and sworn, do hereby state that:

1. I am currently a member in good standing of the bars of the State of Ohio, the United States District Courts for the Southern and Northern Districts of Ohio, and the United States Court of Appeals for the Sixth Circuit.
2. I am not subject to any disciplinary proceedings in any jurisdiction.
3. I have not previously been admitted *pro hac vice* to this Court.
4. I have read and agree to comply with the Local Rules of the District of Massachusetts.

FURTHER AFFIANT SAYETH NAUGHT.

Andrew King

Sworn to and subscribed before me this 13th day of February, 2018.

AMANDA M. MACK

NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES

August 21, 2020

COMMISSION
EXPIRATION:



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Central District

No. 4:18-cv-40009

| | | |
|---------------------|---|-------------------------|
| D.M., et al., |) | |
| PLAINTIFFS, |) | |
| |) | |
| v. |) | CERTIFICATE OF SERVICE. |
| |) | |
| CYNTHIA DUNGEY, |) | |
| DAVID DOMBROWSKI, |) | |
| ASHLEY KELLER, and, |) | |
| LYNN STACY, |) | |
| DEFENDANTS. |) | |

I hereby certify that the above document was served upon the counsel for Defendant Cynthia Dungey and upon the Plaintiffs by first-class, pre-paid, United States mail this Thirteenth day of February, 2018, by forwarding copies to:

Heather and Adam May
187 Ramshorn Road
Dudley, MA 01571

and

Assistant Attorney General Therese Hanna
.Ohio Attorney General's Office
Health and Human Services Section
30 East Broad Street
26th Floor
Columbus, Ohio 43215.

Respectfully certified,

/s/ James P. McKenna

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